

**United States Bankruptcy Court  
Northern District of Illinois, Eastern Division**

IN RE: Tharon Bradley ) Chapter 13  
                          ) Case No. 18 B 16173  
Debtor(s)              ) Judge A. Benjamin Goldgar

**Notice of Motion**

Tharon Bradley  
4600 Blarney Dr  
Matteson, IL 60443

Debtor Attorney: Semrad Law Firm LLC  
via Clerk's ECF noticing procedures

On August 14, 2018 at 11:00 am, I will appear at the location listed to the right, and present this motion.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Tuesday, August 7, 2018.

> Dirksen Federal Building  
> 219 South Dearborn  
> Courtroom 642  
> Chicago, IL 60604

/s/ MARILYN O. MARSHALL  
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MARILYN O. MARSHALL, TRUSTEE

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**Motion to Dismiss Case For Unreasonable Delay**

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, as Debtor(s) failed to file the required documents pursuant to 11 USC §521, §1307, §349, and Rule 3015, and in support thereof states the following:

1. Debtor(s) filed for Chapter 13 on 06/06/2018.
2. The debtor(s) have failed to resolve the pending objection(s) to the plan.
3. The debtor(s) have failed to commit all disposable income to the plan.
4. Debtor's commitment period is incorrect as income is over the median.
5. Debtor has failed to provide proof of contribution of \$1,653.00/month.
6. Debtor has failed to complete the 122C-2 form.
7. Debtor's secured payments in the plan do not match the amounts listed in Schedule D.
8. The debtor's failure to confirm a plan in a timely manner constitutes unreasonable delay.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this court deems just and proper.

Office of the Chapter 13 Trustee  
224 S Michigan Ave  
Ste 800  
Chicago, IL 60604  
(312) 431-1300

/s/ MARILYN O. MARSHALL  
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MARILYN O. MARSHALL, TRUSTEE